

To: Office of the Secretary

Comments of Scott Sanders

I am from station WRFN in Pasquo, Tennessee.

I am writing to ask the FCC to consider LPFM stations signals in assigning 307b preferences to full power FM broadcasters applying to change their community of license.

WRFN is community station. All programmers and board members are from the larger community of Nashville and middle Tennessee. We have no paid staff and we are supported by our neighbors, listeners, and underwriters. We have diverse programming about everything from healthcare to dog training to local singer-songwriters. WRFN is committed to educating local youth on how they can participate in radio by setting up Young Voices of Nashville which teaches local school children how to produce their own broadcasts and then airing it each week. This has also expanded to include a small production studio and teaching program in the Youth Opportunity Center which is a transitional living center for runaway and homeless youth in our area. Because of the catalyzing effect our station has had many people who become active with WRFN realize their potential for volunteering in other ways throughout our community. Some of our programmers even went on to form a free local newspaper called The Nashville Free Press. This is just one example of how we try to expand as much as possible. Another example of our expansion involves our relationship with local public access TV Channel 10 to broadcast our radio signal on their Secondary Audio Programming all over Davidson County which gives us farther reach than our standard 100 watts would normally allow. It is abundantly clear by our example that community radio stations can build stronger and closer knit communities in new and inventive ways and that LPFM stations can serve parts of our communities that full power stations neglect or ignore.

However last year we found out that we were being pushed from our current spot on the dial by full power station WANT of Lebanon, Tennessee, because they are moving their license into Nashville. We were immediately afraid of losing our station. But then we found out that the FCC intervened and would allow us another signal for which we are extremely grateful. Though our future is now more certain, we now have the added strain of changing frequencies and with that all of our promotional efforts as well as the money involved in such a change. We are only one among many of the LPFM stations facing the same problem and as such are one of the lucky ones.

458 low power radio stations have faced encroachment since January 17, 2007, when the FCC changed the process for full power stations to change their community of license from a major modification to a minor modification. In some of the most extreme cases, LPFM stations have been saved from discontinuing their operations through the use of Special Temporary Authorities, allowing

these stations to exist in a limbo until the Commission decides on a more permanent resolution. However, in the more common scenario, the main signal area—already small due to the low power of LPFM stations—are significantly degraded due to these move-ins.

Comments in this Rural Radio proceeding detail how full power stations are able to change their community of license based on a preference given to stations providing either a first or second local transmission service to their new community of license. In other words, they are given a preference to move based on the idea that a community that doesn't have their own radio station would be better served if a commercial station were based there. Meanwhile, the fact that the vast majority of these stations do not even maintain studios within their communities of license indicates that these moves are motivated by the desire to serve an adjacent urban community, not the local community of license.

As a representative of an LPFM station, I believe it is unfair that the existence of an LPFM signal is not even considered in determining whether the move will be granted. Unfortunately, the Commission's new streamlined procedure has eliminated the opportunity for public scrutiny in the application for a change in community of license. These moves are justified by being a unique service to a community, but in reality, they cause significant harm to small communities' only accessible broadcasting outlet, their low power radio stations.

I am writing the Commission to ask that changes to communities of license are only approved after an evaluation of the effect of the move on LPFM stations. If the move is found to disturb an LPFM's broadcast, the change should only be allowed pending an evaluation of the public interest. Thank you for your concern for this issue, which in many cases is a matter of life and death for LPFM stations around the country.

Respectfully submitted,

Scott Sanders